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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029**

**SUBJECT:** Hanlin-Allied Site  
Summary of CERLA 104e Response  
Union Carbide Corporation

**FROM:** Eric L Hallberg/3HS11

October 26, 2000

**TO:** FILE ENFORCEMENT CONFIDENTIAL  
cc. Joseph Donovan/3RC42  
cc. Peter Ludzia/3HS23

**Reference:** Memo to File - Joan Armstrong -6/17/94 PRP responses OLIN CORPORATION, OHIO VALLEY INDUSTRIAL 7 BUSINESS DEVELOPMENT CORPORATION, UNION CARBIDE CORPORATION, AND ALLIED SIGNAL CORPORATION

**BACKGROUND**

The Hanlin-Allied Site is located on 220 acres in Moundsville, West Virginia. Allied Chemicals owned and developed a facility on the site that produced chlor/alkali and chloromethane products from 1953 to 1980. By agreement with Allied, the Union Carbide purchase an 11 acre parcel from Allied in 1955 and resold the parcel back to Allied in 1967. During that period of time Union Carbide built and acetylene plant for the purpose of providing Allied with acetylene and lime slurry, by way of pipe line. Olin Chemical purchased from Allied and now owns a 52 acre parcel which they operated as a chemical manufacturing plant from 1981 to 1984. In 1987 Olin sold a parcel to Hanlin Chemicals, containing three 500 thousand gallon tanks, the one time property of Allied

**PRP SEARCH**

- Joan Armstrong's Memo to File dated 6/17/94 summarizes the results of the search process naming, Allied Signal and Olin Corporation as PRPs. (Hanlin went bankrupt, and EPA shared in the bankrupt proceedings.)
- In July 2000 the EPA oversight team requested that the search process revisit Union Carbide liability issues, since they were an owner/operator at the Site.

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- Eric Hallberg's analysis dated 8/1/00 shows Union Carbide's information in response to EPA's CERCLA 104(e) information request. Also formulated are possible follow-up questions concerning Union Carbide's response.
- On 10/16,2000 Union Carbide responded to EPA's follow up CERCLA 104(e) request dated 9/21/00. The Following information was provided and documented by Union Carbide.
  1. There are no agreement between Allied and Union Carbide pertaining to environment liability or indemnification.
  2. Aside from Allied, Union Carbide is not aware of any other possible source that might have copies of the 1955 and 1957 agreement between the two companies. Union provided EPA copies of the 1955 land deed, and the 1967 re-purchase agreement with Allied
  3. Union Carbide stated there are no documents that indicate they ever used substances causing Site ground water contamination such as, chloroform, carbon tetrachloride, benzene, toluene, or mercury. Union provide plans of their acetylene plant and how acetylene is manufactured.. Calcium carbide is the only hazardous substances used, but when combined with water it produces calcium hydroxide (a/k/a/ lime slurry), which is not a hazardous substance.
  4. Union Carbide stated that the calcium carbide was transported to th plant via 70-ton bulk hopper rail cars, and that all the product was consumed.
  5. Union Carbide said there were no chemicals spill or releases, and that the maintenance of equipments involved only minor amount of oils and lubricants.

## CONCLUSION

Union Carbide used no hazardous substances in its acetylene manufacturing plant, other than calcium carbide, which is neutralized when mixed with water. The Union Carbide plant operated for 11 years, and was bought from and resold to Allied. There are no records of chemical spills or releases, and Union Carbide's equipment maintenance process produced minimal waste. Based on these facts we do not find Union Carbide a responsible or contributing party for the hazardous waste found at the Site.